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7 *Attorneys for Midland Credit*
8 *Management, Inc.*

9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 DIANA VELASCO,

13 Plaintiff,

14 v.

15 MIDLAND CREDIT MANAGEMENT, INC.
16 and RAUSCH STURM LLP,

17 Defendants.

Case No. 2:22-cv-00210-APG-BNW

**STIPULATION AND ORDER FOR
DEFENDANT MIDLAND CREDIT
MANAGEMENT, INC. TO RESPOND TO
THE COMPLAINT**

(First Request)

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20 Plaintiff and Defendant Midland Credit Management, Inc. (“MCM”) stipulate
21 and agree that MCM has up to and including March 25, 2022 to respond to Plaintiff’s
22 Complaint (ECF No. 1) to give the parties time to explore settlement discussions.
23 The current deadline was March 7, 2022. MCM requests that the Court grant this
24 request on the grounds of excusable neglect as provided for in LR IA 6-1. The
25 deadline was overlooked due to a calendaring error, and counsel for MCM has acted
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27
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1 to promptly rectify the matter.

2 DATED this 9th day of March 2022.

3
4 NAYLOR & BRASTER

KAZEROUNI LAW GROUP

5 By: /s/ John M. Naylor

By: /s/ Gustavo Ponce

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10 *Attorneys for Defendants*
11 *Midland Credit Management, Inc.*

Attorneys for Plaintiff

12 **ORDER**

13 IT IS SO ORDERED:

14 
15 UNITED STATES MAGISTRATE JUDGE

16
17 DATED: March 10, 2022

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that I am an employee of NAYLOR & BRASTER and that on this 9th day of March 2022, I caused the document **STIPULATION AND ORDER FOR DEFENDANT MIDLAND CREDIT MANAGEMENT, INC. TO RESPOND TO THE COMPLAINT (First Request)** to be served through the Court's CM/ECF system to those persons designated by the parties that have appeared in the matter.

/s/ Amy Reams
An Employee of NAYLOR & BRASTER

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